Arizona Department of Environmental Quality
Air Quality Division

December 14, 2000

**RESPONSIVENESS SUMMARY**
**to**
**Testimony Taken at the Ozone Oral Proceeding and Written Comments Received on the Serious Area Ozone State Implementation Plan for Maricopa County**

The oral proceeding on the Serious Area Ozone State Implementation Plan for Maricopa County was held at 9:30 am, Wednesday, April 26, 2000, at the Arizona Department of Environmental Quality, Public Hearing Room 1706, 3033 N. Central Avenue, Phoenix, Arizona. No oral comments were received during the proceeding. The Arizona Department of Environmental Quality (ADEQ) received forty-seven written comments during the public comment period, which ended April 26, 2000. The public comments and ADEQ's responses are described below.

Comment 1:
Why was the moderate area ozone plan disapproved by the Environmental Protection Agency?

Response: The Plan was not disapproved; rather, EPA found the initial plan submitted to EPA by the Maricopa Association of Governments incomplete because it failed to include, in fully adopted and enforceable form, all the measures relied upon to meet the 15 percent rate of progress (ROP) requirement in the Clean Air Act (CAA) for moderate nonattainment areas. Additional submissions were made to EPA and the Plan was found to be complete in May 1995.

Comment 2:
How does this plan address whatever deficiencies were found in the moderate area plan?

Response: The moderate Plan deficiencies were resolved in the 15% ROP Federal Implementation Plan (FIP), which was effective in 1998.

Comment 3:
Does this plan address EPA's proposed new ozone standard if it should actually be adopted by EPA in the future?

Response: No. If EPA designates nonattainment areas for the 8-hour standard, a different plan may be necessary for the Maricopa County area.

Comment 4:
How high into the atmosphere does the ground level ozone reach from the valley floor in a worst case scenario in the Phoenix area?

Response: Ground level ozone can reach as high as 2,500 meters (8,250 feet) into the atmosphere, as indicated in the fact that exceedances of the 1-hour standard have been measured at Mt. Ord, which is at 7,000 feet.

Comment 5:
Where in the valley is the ozone problem most serious, what are the sources at this place and what is the peak population exposure at this location on a daily basis?

Response: Recently, the highest 1-hour ozone averages have been measured at the Fountain Hills monitoring site with the highest reading in 1998 of .123 ppm.

Comment 6:
... Do particulate matter, carbon monoxide and ozone always occur together in the Phoenix area...

Response: Carbon monoxide concentrations peak in November-January; hourly concentrations tend to be at their maximum between 6 p.m. and 12 midnight, and during morning rush hour. High ozone concentrations are a summer phenomenon, when sunlight and evaporative hydrocarbon emissions peak. Ozone concentrations are low to near zero at night, rise rapidly throughout the morning and peak in the afternoon. Particulate matter problems are twofold - 24-hour concentrations peak during high wind events, typically in the spring and summer. Chronic exposure to lower levels of particulates occur during stagnant air events in the November-January time period, similar to carbon monoxide.

Comment 7: How does the health effects of ozone compare to those of particulate matter and carbon monoxide?

Response: Ozone is a highly reactive form of oxygen; its powerful reactivity damages lung tissue, reduces lung function, and sensitizes the lungs to other irritants. Particulate matter less than 10 microns in diameter, are easily inhaled deep into the lungs and, as a result, the particles irrate lung tissue, causing respiratory damage, difficult breathing, and aggravation of existing respiratory diseases. Carbon monoxide enters the body through the lungs and affects the central nervous system by depriving the body of oxygen. Blood laden with carbon monoxide can weaken heart contractions, lowering the volume of blood distributed to various part of the body.

Comment 8:
Just how detrimental is the combined effect of two or more of the pollutants at a time on the human body, especially the respiratory system?

Response: ADEQ is unaware of any studies done on the combined effect of two or more of the pollutants at a time on the human body, especially the respiratory system.

Comment 9: How does Phoenix compare with other large Sunbelt communities with respect to the ozone problem?

Response: Other serious ozone nonattainment areas in the Sunbelt include Dallas-Fort Worth and El Paso, Texas; and Santa Barbara, California. Houston, Texas; Ventura County, Sacramento, and San Diego, California are designated severe nonattainment areas for ozone. In addition, the Los Angeles area is classified as an extreme nonattainment area.

Comment 10:
Is there the possibility that ozone pollution originating in the Phoenix area is having a negative impact on outlying communities...?

Response: Yes, sustained high concentrations have been measured in Tonto National Forest, Humboldt Peak and Mt. Ord. Some of the highest concentrations have also been measured at Blue Point Ridge.

Comment 11:
If this is the case, what damage could Phoenix's ozone pollution be causing to the natural-biomass in rural Arizona?

Response: The extent of any damage to natural-biomass is currently unknown.

Comment 12:
Why is ozone pollution more of a summertime problem than a winter time problem?

Response: Ozone is formed by the action of sunlight and heat as volatile organic compounds and nitrogen oxides mix. Typically, wintertime heat and sunlight are not intense enough to create unhealthy levels of ozone pollution.

Comment 13:
Which oxygenated fuels are used here in the Phoenix areas...and do they contain MTBE?

Response: The State of Arizona has implemented a state version of the federal reformulated gasoline program as an ozone control measure since 1998. Arizona's Cleaner Burning Gasoline (CBG) has, until recently, included an oxygenate requirement to be added to the gasoline at all times of the year. MTBE has been the primary oxygenate used during the summer months because the other primary oxygenate, ethanol, tends to enhance the formation of ozone in the extremely high summer temperatures experienced in Phoenix metropolitan area. On April 28, 2000, Governor Jane Dee Hull signed Senate Bill 1504, which became effective immediately. Among other things, the law provides for the removal of the oxygenate requirement in CBG during the summer months, and a phase-out of MTBE by mid 2003. Refiners are working toward meeting this deadline.

Comment 14:
What is DEQ doing to clean up MTBE from the State's groundwater and surface water resources?

Response: In 1998, ADEQ completed a report on MTBE to determine if MTBE has caused problems in any area's ground and surface water supplies.
The report is available at ADEQ's Web site (www.adeq.state.az.us).

Several actions are being taken to simultaneously maintain air quality benefits, enhance water

quality protection, and assure a stable fuel supply at a reasonable cost. These actions include accelerated enforcement of replacement of existing UST systems which are not in compliance, evaluate field performance of UST system design and technology to improve systems and minimize leaks/releases, require monitoring and reporting of MTBE in groundwater at all UST release sites, and consider land-use in planning and permitting decisions for siting of new UST facilities

Comment 15:
Why doesn't the state mandate safer oxygenated fuels than MTBE?

Response: Potential negative affects from MTBE became a topic of concern at the State and national level in the last 3-4 years. The Arizona Legislature's and Governor's actions this past session in introducing and approving legislation to remove the oxygenate requirement from CBG was the first step necessary to remove MTBE from all sources of CBG in the state. Since 1995, Phoenix wintertime gasoline has been all ethanol, not MTBE.

Comment 16:
Does Arizona have legal authority to mandate how oxygenated fuels are formulated...?

Response: Yes. Regulating the type of fuel sold in Arizona, whether produced within or outside the State occurs through the Arizona Department of Weights and Measures (see Arizona Administrative Code, Title 20, Chapter 2, Article 7).

Comment 17:
What are the highest ozone readings recorded on the Phoenix areas freeway systems...?

Response: Although 31% of volatile organic compound emissions in Phoenix come from cars and trucks, highest concentrations tend to occur downwind away from freeway and less frequently in the central city. Monitoring sites are established according to standard EPA criteria.

Comment 18:
What are the highest ozone readings recorded on the surface streets in the Phoenix area...?

Response: The North Phoenix and South Phoenix monitoring sites, located at 601 E. Butler Street and 4732 S. Central Avenue, respectively, had the highest reading of .124 ppm during the period of 1996-1998.

Comment 19:
How many locations in the Phoenix area are ozone readings taken?

Response: There are 23 ozone monitoring site locations in Maricopa County.

Comment 20:
Are ozone readings taken in Yavapai and Pinal Counties?

Response: Yes, monitors are located at Hillside in Yavapai County and at the Apache Junction Highway Yard and Casa Grande Airport in Pinal County. These sites are outside the Maricopa County ozone nonattainment area.

Comment 21:
If the pollution control programs in the moderate area plan could not solve the ozone problem, why expect the serious area plan to solve the ozone problem?

Response: Implementation of the control measures contained in the moderate area plan and this plan have demonstrated attainment of the 1-hour national ambient air quality standard through the fact there have been no violations of the standard during the years 1997-2000.

Comment 22:
Are smaller towns ...being negatively impacted by ozone from sources outside of their jurisdiction?

Response: See Comment 10.

Comment 23:
What is the relationship of the reduction of ozone to particulate matter and carbon monoxide?

Response: The formation of ozone does not directly include CO or particulates. However, control measures that reduce inefficient combustion by vehicles will reduce CO emissions and also reduce VOC and NOx emissions, which are precursors to ozone formation.

Comment 24:
How many vehicles would have to be taken off the road to ensure a future ozone violation not occur again?

Response: It may not be necessary to remove vehicles from the roadways to maintain the l-hour standard because of the availability of cleaner engines and fuels and tighter tailpipe emission standards. Development of a maintenance plan that will detail how the area will stay in attainment is underway.

Comment 25:
How much do air traffic and train traffic contribute to the local ozone problem?

Response: These two source categories are minor contributors to the ozone problem in Maricopa County. Aircraft activity contributes 1,413 tons of VOC, metro total of 123,370 tons per year (1.15%); and 3,954 tons of NOx, metro total of 126,290 tons per year (3.14%). Locomotives contribute 19.3 tons of VOC, metro total of 123,370 tons per year (0.02%); and 387 tons of NOx, metro total of 126,290 tons per year (0.31%).

Comment 26:
How much of a positive impact are the vehicle emission testing and smog dog program having on Phoenix's ozone problem?

Response: The Enhanced Arizona Vehicle Inspection and Maintenance Program that includes the remote sensing component, was approved by EPA in May 1995. This was the one of the most important control measures implemented by the State to help the area reach attainment. The smog dog program was repealed in April 2000 (H.B. 2104) and replaced by a study to determine how to

improve the cost effectiveness of the program while controlling costs.

Comment 27:
What role does the vehicle licensing tax play in supporting the ozone pollution control program?

Response: The vehicle licensing tax (A.R.S. 28-5808) does not have a direct role in supporting the ozone control program. Rather, an air quality fee is collected from every person who registers a vehicle in Arizona (A.R.S. 49-551, section C.1 authorizes fees to be directed to the reduction of ozone.) $1.50 of the vehicle registration fee, assessed annually, is deposited into the Air Quality Fee Fund that is administered by ADEQ.

Comment 28:
Would increasing gasoline taxes or levying an automobile surtax be enough discentives to possibly indirectly reduce the number of vehicles....?

Response: Whether additional taxes on either the fuel or the vehicle would deter people from purchasing vehicles or use ones they now own is very difficult to project. Several factors, including the level of tax, available transportation alternatives, and ability to pay an additional tax, are just a few that would need to be included in such an estimation. The Legislature has consistently rejected this approach. In addition, sufficient emission reductions have occurred to get the area into attainment.

Comment 29:
Are the control measures adopted in House Bill 2001 similar to ozone reducing control measures in other nonattainment areas?

Response: Arizona's Enhanced Vehicle Emissions Inspection Program has been recognized as a model program by other states. Other House Bill 2001 type control measures implemented in other nonattainment areas (e.g., California's South Coast Air Quality Management District and Texas) include traffic signal synchronization and the Trip Reduction Program.

Comment 30:
What has the trend of bus ridership been over the last ten years and has bus ridership had a significant positive effect in reducing ozone pollution?

Response: Historical trends show from 1985 through 1998 the annual boardings have increased from 16.5 million to 36.4 million passengers, with an average of 2.5 passengers per mile of service. This includes the Phoenix area, Mesa, Scottsdale, and Tempe.

Comment 31:
Have all the local jurisdictions in the Phoenix area coordinated their traffic signals...?

Response: Synchronized traffic signals promote steady traffic flow, which helps reduce emissions because idling vehicles emit higher levels of pollution than moving vehicles. Synchronized traffic signals are required by A.R.S. 9-240 for areas throughout the nonattainment area.

Comment 32:

Why did the Clean Air Act require a Rate- of-Progress Demonstration in the ozone plan?

Response: Rate of progress is required in the Clean Air Act to create specific schedules for emission reductions. Because the Maricopa County nonattainment area was and currently is in attainment, no rate of progress demonstration is required by this Plan.

Comment 33:
Isn't the Countywide Travel Reduction Program voluntary?

Response: No. Major employers (those with 50 or more employees at any site in Area A) are required by Maricopa County Travel Reduction Program Ordinance No. P-7 to participate in the Trip Reduction Program. A voluntary participant is an employer that is not a major employer but still chooses to participate in a travel reduction program.

Comment 34:
With respect to alternate fuels, what is the target rate of conversion for government fleets...?

Response: ARS § 41-803 established timelines for the conversion of the state motor fleet to alternative fuel vehicles. For model year 2001 and all subsequent model years, 75% of new state fleet vehicles must be capable of operating on alternative fuels. In counties of populations of more than 1.2 million people (i.e., Maricopa), by model year 2003, 70% of new alternative fuel vehicles purchased must meet EPA's low emission vehicle standards. The conversion of fleets to alternative fuels is not a committed measure in the SIP.

Comment 35:
Could the state subsidize the bus fares for people who consistently use mass transit or give an income tax credit to people who carpool?

Response: Currently over 1200 employers subsidize bus fares 20% - 100% for employees who use mass transit. Arizona offers tax credits and exemptions through the Arizona Department of Revenue for alternative fueled vehicles. State employees can get one half price fare through a similar program.

Comment 36:
Is the reduced gasoline volatility control measure implemented statewide...?

Response: Gasoline volatility limits are 7.8 pounds per square inch (psi) outside of Area A where the volatility limits are 7.0 psi. Fuel supply and distribution is under the jurisdiction of the Arizona Department of Weights and Measures (ADWM).

Comment 37:
How can the state rely on the Enhanced Vehicle Inspection and Maintenance Program (VEIP) in light of recent problems?

Response: The VEIP is still mandated by legislation and continues to be a highly effective control measure.

Comment 38:
How were the repair threshold limits in House Bill 2001 determined?

Response: The limits, set by the Legislature, were based on an average cost of repair with consideration to the value of the vehicle. These meet the federal level repair threshold limits, in accordance with CFR 51.360(a)(7).

Comment 39:
Enhanced vehicle inspection and maintenance (I/M) programs must require vehicle owners to make a minimum expenditure of $450 for repairs to qualify for a waiver. The Arizona program establishes lower qualifying expenditure requirements for pre-1980 model years and therefore does not meet this requirement.

Response: ADEQ believes that the state I/M program satisfies the waiver requirements of the Clean Air Act (CAA) § 182(c)(3)(C)(iii) and 40 C.F.R. § 51.360(a). In arguing that the Arizona program fails to meet the minimum qualifying expenditure requirements of the CAA and EPA's implementing regulations for enhanced I/M programs, the commentor fails to take into account the time allowed to complete repairs. As the following side-by-side comparison demonstrates, the Arizona waiver provisions are in all respects more stringent than the minimum requirements of the federal enhanced I/M rule, when the timing of repairs is taken into account.

See Table A.

**Table A. Comparison of Waiver Provisions in Federal Enhanced I/M Regulation and Arizona Program**

| | Federal Enhanced I/M | Arizona I/M |
|---|---|---|
| **First test failure (after 1/1/1997):** | | |
| Relief allowed | Extension of time to repair for the period of one test cycle [40 C.F.R. § 51.360(a)(9)] | One-time waiver of requirement to meet standards; expires at the end of the next test cycle [A.R.S. § 49-542(D)] |
| Condition(s) for obtaining relief | "Economic hardship" [40 C.F.R. § 51.360(a)(9)] | Qualifying expenditure of $200 for pre-1975 model years, $300 for 1975-79 model years, $450 for 1980+ model years [A.R.S. § 49-542(L)]<br><br>Repairs must achieve emissions less than twice the applicable standards, regardless of cost [A.R.S. § 49-542(Y)]<br><br>Test failure must not be due to catalytic converter system [A.R.S. § 49-542(R)] |
| **Failure during subsequent test cycles:** | | |
| Relief allowed | Waiver of requirement to meet standards [40 C.F.R. § 51.360] | None: repair required regardless of cost [A.R.S. § 49-542(D)] |
| Condition(s) for obtaining relief | Qualifying expenditure of $450 + inflation since 1989 [40 C.F.R. § 51.360(a)(7)] | Not applicable |

As Table A indicates, the federal rule allows a vehicle to obtain an extension of the time for meeting the minimum expenditure requirement on the basis of "economic hardship." The extension may be as long as the period of the test cycle (i.e. one or two years, depending on the model year of the vehicle). EPA has provided the following explanation for this provision:

> The $450 minimum is not as significant an issue for newer vehicles which are more likely to be under warranty, fail less often, and have a high market value. It may, however, pose a greater hardship on owners of older vehicles. Therefore, the regulation allows states to offer a well-controlled,

> non-renewable, time extension beyond the scheduled compliance deadline, to give motorists additional time to pass the inspection or to sell the vehicle in the case of economic hardship. This time extension is not a waiver--the vehicle owner is not in compliance until the repairs are made--it is just a question of timing. Neither the Act nor the legislative history addresses the question of extensions, even though the Act does specify various details about waiver requirements. Historically, EPA's I/M guidance has provided for time extensions to allow vehicle owners to make repairs or test vehicles. Section 182(a)(2)(B) appears to ratify EPA's past I/M guidance.

See 57 Fed. Reg. 52950, 52964 (1992).

Under this reasoning, the Arizona waiver is in substance an extension of time to make repairs, rather than a waiver as that term is used in the federal rule. Like the federal extension, the Arizona waiver offers "a well controlled, non-renewable, time extension beyond the scheduled compliance deadline . . . ." On expiration of EPA's non-renewable extension, a waiver is available for the next test cycle and all succeeding test cycles, provided the motorist makes the minimum qualifying expenditures. When Arizona's non-renewable extension expires, no further relief is available. The vehicle must meet applicable standards regardless of cost.

Rather than conditioning its non-renewable extension of time on a vague requirement to establish "economic hardship," Arizona's program requires motorists to make specific minimum repair expenditures to qualify. Consistent with EPA's recognition that the burden of repairs is greatest on owners of older vehicles, the Arizona statute establishes graduated minimum expenditures that decrease with the age of the vehicle. Unlike the federal rule, the Arizona program will deny even a non-renewable extension to vehicles that (1) fail inspection due to the catalytic converter system or (2) have emissions more than twice the applicable standard. The Department therefore disagrees with this comment. The State's waiver provisions exceed federal requirements.

Comment 40:
The Plan does not include a remote sensing program element of the VEIP.

Response:
The State has met the remote sensing program requirements for the year 2000. For future years, as indicated in the response to Comment 26, the State plans to replace the previous remote sensing program with a more cost effective one. Specifics of the proposed program will be included in a separate VEIP SIP revision package currently under development and anticipated to go through the public review and comment period in early 2001.

Comment 41:
The Plan fails to include RACT for four major sources of VOCs in three industrial categories.

Response: Three of the four major sources listed in the County commitment were subject to rule requirements to demonstrate RACT or BACT in 1989 through 1993. These three sources implemented RACT shortly after their respective permits were revised or issued prior to May 31, 1995.
The section of the commitment letter entitled "RACT Determinations" describes the date RACT was applied to these sources and the basic control measures and techniques implemented by the sources.

The County commitment letter also describes a legal mechanism by which these pre-existing County RACT determinations will be reviewed by EPA, revised if necessary and approved into the SIP. The major source operating permits will include the specific emission limitations, monitoring and recordkeeping requirements necessary for each of the sources to support the basic RACT control measures and techniques implemented. Maricopa County will also follow this administrative procedure for the fourth source. This process will provide for EPA review and action on the determination that RACT controls are infeasible, if that initial determination continues to stand up through the permitting process, or the RACT determination if it does not. Given EPA's standard timeline for acting on SIPs, the submittal of RACT for these sources to EPA will be completed by June 2000 prior to any final action by EPA on the Serious Area Ozone SIP. Under these circumstances, conditional approval would not be necessary.

RACT control for the fourth source, fiberboard saturation, is under development by the County and EPA. Non-stack emissions, approximately 415 tons per year for VOC, are expected to be reduced once an effective RACT strategy is developed, implemented and applied.

Comments 42- 45:
The Plan fails to comply with CAA requirements for rate of progress demonstration, modeled attainment demonstration, contingency measures and additional transportation control measures.

Response: ADEQ has followed the guidance set forth in the May 5, 1995, Environmental Protection Agency memorandum titled, "Reasonable Further Progress, Attainment Demonstration, and Related Requirements for Ozone Nonattainment Areas Meeting the Ozone National Ambient Air Quality Standard (NAAQS)." This memorandum details EPA's interpretation of CAA requirements related to nonattainment areas that have attained the ozone NAAQS. The memorandum reasonably concludes that the requirements of the CAA requiring emission reductions leading to attainment are inapplicable to an area that has already attained the ozone standard. Specifically, the memorandum states that a SIP for an area that has attained the standard need not contain a demonstration of attainment, provisions for reasonable further progress toward attainment, contingency measures or additional transportation control measures. The comment's assertion regarding the policy's inconsistency with the Clean Air Act is contradicted by the decision of the 10th Circuit Court of Appeals, which upheld the policy in *Sierra Club v. U.S. EPA*, 99 F.3d 1551 (10th Cir. 1996). ADEQ agrees with the court's conclusion that EPA's policy represents a reasonable interpretation of a state the agency is charged with administering. That interpretation will allow ADEQ to focus on the measures necessary to assure continued attainment in the future, rather than the somewhat artificial emissions reduction requirements of Title I, Part D, Subpart 2 of the CAA.

Comment 46:

The Plan fails to comply with severe area requirements. The Phoenix nonattainment area is subject to severe area requirements, because it failed to submit a demonstration that a "milestone" had been achieved within 90 days after November 15, 1999, as required by section 182(g)(2) of the CAA. Under CAA § 182(g)(3), a state that fails to submit a milestone demonstration must make an election within 9 months after the demonstration deadline is reclassified by operation of law to the next higher classification. Because the Phoenix nonattainment area was not likely to make an election by November 14, 2000, it is subject to reclassification under section 182(g)(3) and should comply with severe area requirements.

Response:

Section 182(g)(2) of the CAA is inapplicable to the Phoenix nonattainment area under the plain language of the CAA.

Section 182(b)(1) requires ozone nonattainment areas classified as moderate or worse to achieve reductions in the VOC emissions of 15 percent from a 1990 baseline by November 15, 1996. Section 182(c)(2)(B) and (C) require areas classified serious or worse to reduce VOC or, in some cases, $No_x$ emissions by an average of 3 percent per year over each succeeding 3-year period "until the attainment date."

Section 182(g)(1) requires states to make a determination that these emissions reductions, called "milestones," have occurred for each ozone nonattainment area classified as serious or worse. Because the Phoenix nonattainment area was still classified as moderate on November 15, 1996, it was not subject to the first milestone requirement, as the comment apparently recognizes. The comment argues that a milestone demonstration was required by February 15, 2000, 90 days after the November 15, 1999, milestone date.

Section 182(g)(2) requires states to submit "a demonstration that the milestone has been met" for:

> "each nonattainment area referred to in [section 182(g)(1)], not later than 90 days after the date on which an applicable milestone occurs *(not including an attainment date on which an applicable milestone occurs in cases where the standard has been attained)*...."

(Emphasis added.) The November 15, 1999 milestone date fits squarely within the italicized exclusion. November 15, 1999 was the attainment deadline for serious areas, and the Phoenix area achieved the ozone standard on that date. Under the plain language of section 182(g)(2), the state therefore was not required to submit a milestone demonstration, and the Phoenix area was never subject to reclassification under section 182(g)(3).



Comment 47:
Sampling procedure for the Type 2 site should be modified to allow for more forecasted-episode days on which sampling is performed and the threshold for defining a forecasted-episode day should

be .12 ppm.

Response: The State operates a PAMS sampling schedule that considers both operational logistics and the costs of sample analysis. The every other day sampling schedule, known as "trend" monitoring, will capture about one-half of the forecasted "episode days" during most ozone seasons. To date, the typical ozone season produces about five forecasted episode days, and with the every other day schedule likely to capture half of these episode days, it serves as a reasonable assessment. Monitoring on the five additional forecasted days in the PAMS monitoring plan is not an upper limit. The State, keeping in mind that this is an operational plan, will monitor more days as necessary and practicable. In 1999, six episode days were forecast. The design value of 0.14 ppm ozone, last measured in 1996, is not a cut off for episode forecasting purposes. Ozone episodes are forecast when the ozone concentration values on a given day might approach the 0.12 ppm NAAQS standard, taking meteorology and ozone data into consideration.

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**Edits to Final SIP:**

During its final review of the proposed SIP revision, ADEQ determined some clarifications were appropriate. The clarifications, described below, are included in the final SIP revision document.
1) Maricopa County Rule 347, Ferrous Sand Casting, approved effective August 11, 2000, is reference on page 2-5 (2.2.4.1) of the SIP.

2) It was determined by EPA and ADEQ that the Arizona Photochemical Assessment Monitoring Stations (PAMS) Network Plan, being an ongoing operational planning document, be removed from the SIP to allow for continued design enhancement of the monitoring network. Regular updates of the document will be submitted to EPA.

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